

1 DANIEL HILL
2 HILL FIRM PLLC
3 Nevada Bar No. 12773
228 S. 4th Street, 3rd Floor
3 Las Vegas, Nevada 89101
4 Phone: 702-848-5000
5 Fax: 702-442-8338
dan@hillfirmlawyers.com
5 Attorney for Defendant

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**
8 -oOo-

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 SHAMARIAE JONES,

13 Defendant.

Case No. 2:17-cr-00042-APG-DJA

STIPULATION TO CONTINUE
SENTENCING
(First Request)

14 IT IS HEREBY STIPULATED AND AGREED by and between the United States
15 of America, through Shaheen Torgoley and Allison Reese, Assistant United States
16 Attorneys, together with Daniel Hill, counsel for defendant Shamariae Jones, that the
17 sentencing hearing currently scheduled for August 25, 2021 be vacated and set to a date
18 and time convenient to this Court, but no sooner than 45 days from the current
19 sentencing date.

20 This stipulation is entered into for the following reasons:

21 1. The Defendant is in custody and does not object to the continuance.
22
23 2. Undersigned counsel needs additional time to prepare for Defendant's
sentencing.
24

1 hearing.

2 3. Still pending is Mr. Jones' motion for judgment of acquittal, the outcome of
3 which may substantially change the parties' positions regarding sentencing.
4 4. The parties agree to the continuance.
5 5. Additionally, denial of this request for continuance could result in a
6 miscarriage of justice.
7 6. The additional time requested by this Stipulation is made in good faith and
8 not for purposes of delay.

9 This is the first request for a continuance of the sentencing hearing.

10 DATED this 17th day of August 2021.

11 */s/ Daniel Hill*

12 _____
13 Daniel Hill, Esq.
Counsel for Defendant

14 */s/ Shaheen Torgoley*
/s/ Allison Reese

15 _____
16 Shaheen Torgoley, Esq.
Allison Reese, Esq.
Counsel for the United States

17

18

19

20

21

22

23

24

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

-oOo-

UNITED STATES OF AMERICA,

2:17-cr-00042-APG-DJA

Plaintiff,

ORDER

vs.

SHAMARIAE JONES,

Defendant.

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy sentencing, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for sentencing, taking into account the exercise of due diligence.

IT IS THEREFORE ORDERED that sentencing in the above-captioned matter currently scheduled for August 25, 2021, be vacated and continued to November 3, 2021, at 2:30 p.m. in LV Courtroom 6C.

DATED August 17, 2021

THE HONORABLE ANDREW P. GORDON
U.S. DISTRICT COURT JUDGE